

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA  
Philadelphia Division**

Trinh Chau,

*Debtor.*

Case No. 20-12638-PMM  
Chapter 13

**Motion to Modify Plan After Confirmation**

Debtor Trinh Chau, through her attorney, moves this Court as follows:

1. The Debtor filed a bankruptcy petition on June 15, 2020.
2. The Debtor wants to modify the plan to resolve the trustee's recent motion to dismiss this case for failure to make plan payments.
3. The Debtor requests that the Court enter an order approving the plan filed at ECF No. 63 as the new confirmed plan.

For those reasons, the Court must grant relief in the form of order attached, and further in the Debtor's favor if necessary and proper under the law.

Date: June 3, 2024

CIBIK LAW, P.C.  
*Attorney for Debtor*

By: 

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